

### Remarks

This application contains claims 22-29. Claim 22 has been amended to clarify that power is transferred from the battery to the electric circuit using non-electrical contact coupling. Claims 27 and 28 have been amended to add punctuation consistent with the other dependent claims.

Claims 22-29 stand rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 3,840,795 to *Roszyk et al.* (hereinafter *Roszyk*). Withdrawal of the rejection is respectfully requested for at least the following reasons.

Claim 22 recites a method of transferring power on an in- or under-the-water electrically operated device from a battery that is both fully water sealed and, in use, fully electrically insulated to a water and electrically sealed electric circuit in the device. As noted above, power is transferred from the battery using non-electrical coupling. This is advantageous, for example, in that a user can replace the battery in total safety in an electrically operated device dripping with water.<sup>1</sup>

*Roszyk* discloses a device that is powered by a battery. The battery is inductively charged by an external power supply. The battery is then used to power the device using conventional contact circuitry (see, e.g., Fig. 6 of *Roszyk*, wherein the battery 21 is electrically connected to the motor 20 and switch 22 via contacts 21a, 21b, respectively). Thus, *Roszyk* does not teach or even suggest a method wherein power in an in- or under-the-water electrically operated device is transferred from a battery to electrical circuitry using non-electrical coupling.

Accordingly, withdrawal of the rejection of claim 22 is respectfully requested.

Claims 23-29 directly or indirectly depend from claim 22 and therefore can be distinguished from *Roszyk* for at least the same reasons.

Accordingly, withdrawal of the rejection of claims 23-29 is respectfully requested.

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<sup>1</sup> See, e.g., page 25, lines 18-20 of the specification

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In view of the foregoing, request is made for timely issuance of a notice of allowance.

Respectfully submitted,

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CERTIFICATE OF MAILING (37 CFR 1.8a)

I hereby certify that this paper (along with any paper or thing referred to as being attached or enclosed) is being deposited with the United States Postal Service on the date shown below with sufficient postage as first class mail in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450.

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